

I. Introduction

- A. It is the policy and practice of Geocomp Corporation (Geocomp) to control hazards in the workplace to the greatest extent feasible to reduce the potential for employee injury.
- B. Geocomp has developed this written Hazard Communication (HAZCOM) Program to ensure that our employees' health and safety is protected in the work environment. It is based upon the requirements of the OSHA Hazard Communication Standard, 29 CFR 1910.1200.
- C. Geocomp maintains and complies with this program on all projects and in all work areas where our employees may be potentially exposed to chemical hazards. As part of this program, Material Safety Data Sheets (MSDSs) are available for the chemicals used in all areas and on all work sites, chemicals are labeled, and employees receive both generic as well as job specific training in the course of their employment.
- D. This written Hazard Communication Program is available upon request, to any employee, their designated representative(s), and government regulators.

II. Purpose

- A. Geocomp provides information to employees about workplace chemical hazards so that employees are knowledgeable and aware of how to protect themselves while working with these materials.
- B. The Geocomp HAZCOM Program includes requirements for container labeling, availability and use of Material Safety Data Sheets (MSDSs), and chemical safety training.

III. Hazard Communication Program Responsibilities

A. Company President

- 1. Ensure that adequate staff resources, budget, time, equipment, and training are available for all employees who have HAZCOM Program responsibilities.
- 2. Ensure that all managers and employees are held responsible for their HAZCOM Program responsibilities.
- 3. Ensure that the HAZCOM Program is managed, as are all the other important company programs.

B. Managers

- 1. Implementation of the HAZCOM Program on their projects and/or within their respective work areas.
- 2. Provide day-to-day oversight of the use of hazardous chemicals by employees on their projects and/or within their respective work areas.
- 3. Ensure that for all chemicals approved for use by Geocomp on their projects and/or within their respective work areas that there are a current chemical inventory and up-to-date MSDSs available. This includes those that are present for permanent use as well as for evaluation or testing purposes.

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4. Ensure that all chemical containers on their projects and/or within their respective work areas have HAZCOM-compliant labels.
 5. Ensure that employees are trained about the general and project/work area specific chemical hazards and that this training is documented.
 6. Ensure that a project/work area specific hazard assessment has been conducted and the appropriate personal protective equipment is provided and used.
 7. Ensure that employees are trained to the extent necessary to respond in the event of a spill or leak of a chemical on their project/in their work area.
 8. Conduct regular, formal HAZCOM and housekeeping inspections including routine inspections of emergency equipment.
 9. Supervise outside contractors working under their control.
 - a. Ensure that they have a documented HAZCOM program and have conducted and documented the required training.
 - b. Ensure that they are aware of any specific hazards to which they may be exposed during their work with Geocomp.

C. Employees

1. Remain alert to the potential hazards of all the chemicals on their projects and/or in their work areas.
2. Review MSDSs and labels for specific hazard information concerning the chemicals with which they work.
3. Follow appropriate safe work procedures that have been established to protect their health and safety.
4. Wear all required personal protective equipment.
5. Actively participate in and complete all training required by the HAZCOM Program.
6. Contact their Manager or the Safety Officer if they have any questions regarding the hazards associated with their work.
7. Plan and conduct each operation in accordance with Geocomp HAZCOM procedures.
8. Conduct work in a manner so as to coincide with appropriately protective chemical usage and handling methods.

D. Safety Officer

1. Designated as the HAZCOM Coordinator to ensure the implementation of the overall HAZCOM Program by the affected Managers and employees.
2. Provide ongoing Health and Safety Program support to assist in providing for ongoing HAZCOM Program compliance at Geocomp.

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3. Ensure that appropriate documentation of the HAZCOM Program is maintained, including Material Safety Data Sheets (MSDS) and Training Records.
 4. Maintain a master inventory of MSDSs.
 5. Participate in the review and approval of all new chemicals.
 6. Ensure that all employees receive project and/or work area specific chemical safety training.
 7. Ensure that all employees understand their HAZCOM Program implementation responsibilities.
 8. Provide HAZCOM Program oversight.

IV. Chemical/Hazardous Materials Purchasing Procedures

- A. To purchase chemicals new to the company or that will be used in a significantly different manner, an up-to-date MSDS shall be obtained. The requestor will submit the MSDS with a completed chemical approval form (Appendix A or equivalent) to the Safety Officer for review.
- B. The Safety Officer will complete the chemical review documentation. The requestor as well as affected employees will be informed of any addition hazards/required controls and/or PPE requirements necessary in order to safely use this material.
- C. Upon completion of the chemical approval for the new chemical, the requested chemical may then be purchased.
- D. Only chemicals that have been approved for use by Geocomp may be purchased for use. Chemicals already in use that are on the inventory and for which there is already an MSDS on file should be reviewed when next used/purchased to ensure that they are being used in a proper manner.
- E. *Using professional discretion, the Safety Officer may immediately direct the removal of any particularly hazardous chemical found in Geocomp's operations that has not been adequately reviewed and approved, until such a review can be accomplished.*

V. Material Safety Data Sheets (MSDS)

- A. MSDSs shall be available to Geocomp employees during that shift when they are requested.
- B. Copies of the complete company Chemical Inventory as well as the Geocomp chemical MSDSs shall be maintained by the Safety Officer.
- C. For new chemicals, the requestor will be responsible for obtaining the most current MSDS supplied by the manufacturer, importer, or vendor and providing it as part of the Chemical Approval Process.
- D. For existing chemicals being used in Geocomp's operations, as new MSDSs are received they shall be provided to the Safety Officer for inclusion into the MSDS file. This is to ensure that Geocomp has the most up to date MSDSs in the master MSDS file.
- E. The Safety Officer will be responsible to ensure that the master list of MSDSs for chemicals used by Geocomp remains current.

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- F. As part of the Chemical Approval Process, MSDSs will be reviewed for completeness.
 - G. Under no circumstances is a chemical permitted to be present at an Geocomp operation without being adequately reviewed; approved; and having a current and complete MSDS on file and available.

VI. Policy for Obtaining an Original MSDS

- 1. When substances are purchased, or no-charge/free sample items are used, the requestor will obtain an MSDS from the manufacturer or distributor and supply a copy as part of the Chemical Approval Process.
- 2. The Safety Officer will ensure that the master MSDS inventory is updated.
- 3. Anyone unable to obtain missing MSDSs for any chemicals in used in their areas should notify the Safety Officer for assistance.

VII. Container Labeling and Storage

A. Label and Storage Policy

- 1. All chemical containers must have HAZCOM-compliant labels that are legible, in English, and prominently displayed.
- 2. Labels on incoming chemical containers cannot be removed unless they are immediately replaced with a new HAZCOM-compliant label.
- 3. Damaged labels must be replaced. Original containers, secondary containers, and storage areas all have specific labeling requirements.

B. Original and Secondary Containers

- 1. An original container is the container in which the product is received.
- 2. A secondary container is the container in which the product is dispensed for use. Examples of secondary containers include squeeze bottles. Managers and employees will ensure that all secondary containers are properly labeled.
- 3. All containers must have HAZCOM-compliant labels with the following information present:
 - a. Identity of the hazardous chemical(s)
 - b. Appropriate hazard warnings
 - c. Words, pictures, symbols, or combination which provide chemical hazard information, and which, in conjunction with the other information provided with the HAZCOM Program, provide specific information regarding the physical and health hazards of the hazardous chemical i.e. target organs, whether corrosive, etc.)
 - d. First aid information
 - e. Name and address of the chemical manufacturer, importer, or other responsible party (Required for original containers only)

C. Chemical Storage Cabinets, Gas Cabinets, and Storage Tanks

1. Chemical storage cabinets will be labeled with the NFPA (National Fire Protection Association) labels.
2. As part of the chemical review, approval must include any storage requirements to ensure that incompatibles are stored separately. See the MSDS and label for guidance.

VIII. Hazardous Non-Routine Tasks

- A. Employees may be required to perform tasks that will require exposure to hazardous substances or conditions not usual to their normal work duties.
- B. Prior to starting work on such projects, affected employees will be given information by the Manager about hazards to which they may be exposed during the specific activity. The Safety Officer will be available to assist in evaluating any safeguards that might be required for a non-routine task.
- C. A Safe Work Procedure (SWP) will be written for all non-routine tasks. The Manager(s), Employees, and Safety Officer are responsible to ensure that SWPs are written for non-routine and/or new project tasks and that employees have received training on the Safe Work Procedures contained therein. Information contained in the SWP includes:
 1. Specific hazards
 2. Protective/safety measures which must be utilized
 3. Measures that Geocomp has taken to reduce the hazards including engineering controls, respirators, the presence of another employee, and emergency procedures.

IX. Employee Information and Training

- A. All employees handling, working with, or potentially exposed to, hazardous substances in their work place will be provided with health and safety orientation prior to starting work and when a new hazard is introduced into their work area.
- B. Refresher training shall be conducted at least annually for all employees except those working in strictly office jobs.
- C. The Safety Officer is responsible for assuring that on-going training is provided as needed for employees.
- D. Training will be documented and the records maintained in employee personnel files.
- E. It is the policy of Geocomp that employees are apprised of the hazards of chemicals present in their work area and the responsibility of the Safety Officer to coordinate employee training about the following:
 1. An overview of the requirements contained in the HAZCOM Regulations, including their rights under the regulation.
 2. Location and availability of the Geocomp written HAZCOM Program.
 3. Operations in their projects/work areas where hazardous substances are present.

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4. Physical and health effects of the hazardous substances employees might be exposed to.
 5. Methods and observation techniques used to determine the presence or release of hazardous substances in the work area.
 6. Methods of control, such as engineering controls and protective equipment that can be used to lessen or prevent exposure to these hazardous substances.
 7. Emergency and first aid procedures to follow if employees are exposed to hazardous substances.
 8. How to read labels and review MSDSs to obtain appropriate hazard information.
 9. How to react to a chemical spill, leak, or other exposure.
 10. The aim of training and information dissemination is to ensure that all individuals at risk are adequately informed about their work, its risks, and what to do if an accident occurs.

GEOCOMP CORPORATION
CHEMICAL/HAZARDOUS MATERIALS APPROVAL FORM
(Material Safety Data Sheet must be attached)

1. Name of chemical(s) or product(s): _____
2. Are the product information sheets / Material Data Sheets (MSDSs) attached? *(circle one)* Yes / No
(A current MSDS must be attached to continue)
3. Does the product constitute a potential health/fire/or other usage hazard? Yes / No
If yes, explain.
4. Will the use of the product(s) require the use of any special control measures (PPE)? Yes / No
If yes, explain.
5. Will the use of the product(s) require the use of any Personal Protective Equipment (PPE)? Yes / No
If yes, explain.
6. Will use of this product require air sampling to monitor for potential airborne exposures? Yes / No
If yes, explain.
7. Is there additional employee training required for the safe use of this product? Yes / No
If yes, explain.
8. Are there any other Safety or health concerns pertaining to this product? Yes / No
If yes, explain.

Requester (Name and Date) _____

Requirements for use.

Safety Officer (Name and Date) _____